



# **Evidence of Improvement:**

**Guidelines to Inform Exit Criteria for ESSA State Accountability Systems**

## THE COUNCIL OF CHIEF STATE SCHOOL OFFICERS

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### **Evidence of Improvement: Guidelines to Inform Exit Criteria for ESSA State Accountability Systems**

#### **COUNCIL OF CHIEF STATE SCHOOL OFFICERS**

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## INTRODUCTION

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Much has been written about requirements in the Every Student Succeeds Act (ESSA) related to school classification, particularly with respect to approaches for determining if a school should be identified for support. However, less attention has been given to methods for determining when a school's performance is sufficient to exit such identification. Exit criteria offer clear goals to schools and districts that are connected to the state's accountability system and reflect improvement expectations that should be sustained over time.<sup>1,2</sup> If exit criteria are incoherently or unintentionally specified, they can lead to unattainable targets, inaccurate interpretations of whether schools need the same intensity of support, or distractions associated with managing perceptions instead of improvement.<sup>3</sup> Accordingly, the focus of this brief is to discuss principles to inform exit criteria and to provide guidance to help state leaders apply these principles.

The essential question we attempt to address in this brief is, "How can we recognize sustainable and scalable school improvement when we see it?" Because this is a timely and important issue to state education leaders, we explicitly frame this topic in the context of school accountability systems developed in response to ESSA. In fact, we will focus most directly on approaches to inform exit standards for the categories of Comprehensive Support and Improvement (CSI) and Additional Targeted Support and Improvement (ATSI) given the explicit statutory requirements for these categories, detailed in the next section. We believe the principles addressed in this document have broad implications for accountability and support practices that transcend the policies and practices of ESSA.

## ESSA REQUIREMENTS

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### *Identification Criteria*

We will start by briefly reviewing the ESSA requirements related to school classification. The requirements for each of the three federally-required classification categories are summarized in Table 1<sup>4</sup>. The state may designate additional classifications (e.g. letter grades, reward schools) which may be integrated with or separate from those required by ESSA.

1 Carroll, K. (2018). Improving Outcomes for Students: Bringing Accountability and School Improvement Together to Drive Change. CCSSO: Washington, D.C.

2 For more information on sustaining successful school improvement efforts see: Council of Chief State School Officers and EducationCounsel. 2018. Deep Dive into Principle #10 of the CCSSO Principles of Effective School Improvement Systems. CCSSO: Washington, DC.

3 D'Brot, Keng, & Landl (2018) Accountability Identification is only the Beginning: Monitoring and Evaluating Accountability Results and Implementation. CCSSO: Washington, D.C.

4 For more information about understanding and implementing ESSA classifications see: Lyons, D'Brot, & Landl (2017). State Systems of Identification and Support under ESSA: A Focus on Designing and Revising Systems of School Identification. CCSSO: Washington, D.C.

D'Brot, Lyons, & Landl (2017). State Systems of Identification and Support under ESSA: Evaluating Identification Methods and Results in an Accountability System. CCSSO: Washington, D.C.

D'Brot, Keng, & Landl (2018) Accountability Identification is only the Beginning: Monitoring and Evaluating Accountability Results and Implementation. CCSSO: Washington, D.C.

**Table 1. Summary of ESSA Classification Requirements**

Category	Which Schools?	Timing
<b>Comprehensive Support and Improvement (CSI)</b>	No fewer than the lowest performing 5% of all Title I schools based on the state's system of meaningful differentiation with all indicators  Title I schools that have failed to exit ATSI within a state-determined number of years  All public high schools (not just Title I) with a graduation rate less than 67%	At least once every three years
<b>Targeted Support and Improvement (TSI)</b>	All schools with student groups that are consistently underperforming, as defined by the state, based on the state's system of meaningful differentiation with all indicators	Annually
<b>Additional Targeted Support and Improvement (ATSI)</b>	Any school in which the performance of any student group, on its own, would lead to identification for CSI because the student group performance falls within the range of the lowest performing five percent of all Title I schools (may or may not be a subset of TSI schools)	State Determined*

\*ESSA does not explicitly state how often ATSI schools must be identified. States have adopted different approaches in their ESSA state plans.

## Exit Criteria

ESSA provides flexibility for states as they develop their statewide exit criteria. The law requires states to develop exit criteria for CSI and ATSI schools that must “ensure continued progress to improve student academic achievement and school success” (ESEA section 1111(d)(3)).

With respect to CSI, the state must specify the criteria and the number of years by which the criteria must be satisfied. The time permitted to meet the exit criteria is determined by the state but may not exceed a maximum of four (4) years. If a school fails to exit CSI in the established timeframe this “shall, result in more rigorous state-determined action, such as the implementation of interventions (which may include addressing school-level operations.)” (ESEA section 1111(d)(3)(A)(i)(I)).

Regarding ATSI, there only requirement is to develop exit criteria which, if not satisfied in a state-determined number of years, results in CSI identification. ESSA does not specify a maximum number of years.

## GUIDING PRINCIPLES

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There is no single correct method for establishing appropriate exit standards. As with most decisions about the state's accountability system, it is critical to align the goals, design decisions, and methods with the state's policy priorities and theory of action for school improvement. For example, states may differ in the way they emphasize outcomes associated with post-secondary readiness or emphasize the balance between academic growth and proficiency. Consider also that states differ with respect to their long-term and interim goals and may sensibly choose to reflect these goals in the exit standards, which would lead to appropriate and defensible variation among criteria. Finally, states may differ with respect to improvement strategies and capacity, which certainly influence the decisions about which and how many schools can be supported and to what degree. Therefore, the principles and illustrations in the subsequent sections are not intended to be interpreted as uniform or overly prescriptive. Rather, we suggest states consider how these principles can be applied in context to complement established policy priorities.

### ***Five Principles for Exit Criteria***

We propose five principles to guide creation and evaluation of criteria for determining if schools have demonstrated sufficient and sustained progress. These principles and the central question they address are summarized in Table 2.

**Table 2. Five Principles to Inform Exit Criteria**

Principle	Essential Question
<b>Coherence</b>	Has the school addressed the factors that led to initial identification?
<b>Consistency</b>	Has the improvement been sustained over time or coherently across indicators?
<b>Significance</b>	Is the amount of progress exhibited meaningful?
<b>Internal Corroboration</b>	Is there evidence that the school benefitted from supports that are logically related to the area(s) of need?
<b>External Corroboration</b>	Are there multiple sources of evidence to validate the outcome?

The first four principles: coherence, consistency, significance, and internal corroboration can directly inform the process of identifying and applying exit criteria. We suggest applying the fifth principle, external corroboration, as part of an ongoing monitoring and evaluation process. We will discuss these principles in more detail in the following section.

### ***Coherence***

Schools exhibiting meaningful improvement have addressed the factors that led to initial classification. For example, if a school was identified for improvement based on low rates of proficiency in mathematics, then it would be incoherent for that school to base exit classification for making progress in English language arts.

This may be more straightforward to implement when decisions are made based on a performance profile. For example, in a system that renders an overall decision based on target performance in multiple categories, a coherent criterion is one that requires the school to address that category or categories that led to initial identification. In other words, to require that schools make sufficient improvement on the indicators or data elements that led to their identification.

However, many state ESSA systems are based on performance indices that are compensatory. For example, in a compensatory system, multiple categories receive numerical scores which are combined via a weighted composite to produce an overall score. In such a system, a criterion that is based on an overall score increase may not address the factor(s) that led to initial placement. Such systems may permit exceptionally high performance in one area to offset very low performance in another. For this reason, states that use a compensatory system may wish to consider adding some requirements to define the acceptable performance profile(s) that will qualify for exit in order to ensure the critical and coherent areas of improvement are addressed. We discuss this more in a subsequent section of this brief.

## ***Consistency***

Claims of improvement are best supported when there is consistent evidence over time and across indicators. This is especially important if the performance in question is based on a small n-size, which can result in unexpected variances across years.

This criterion may be especially important with respect to evaluating student group performance for ATSI exit. As noted previously, ESSA requires states to determine a timeframe to classify a school as CSI if the school fails to exit ATSI. The implication is that multiple years of low performance provides stronger evidence that the school is not serving that group of students effectively. It stands to reason that the decision to exit a school from support should also be grounded in sustained or consistent evidence of improvement over multiple years.

To bolster evidence of consistency, especially when n-sizes are low or patterns are uneven, states might consider strategies such as: (1) setting a minimum threshold for multiple indicators or (2) evaluating progress based on a multi-year composite potentially using confidence intervals. Examining evidence for this criterion will differ depending on how exit criteria are operationalized. In the case of the first strategy, setting criteria for multiple indicators can help states better understand whether improvement across indicators results in meaningful change over time. Alternatively, setting indicator-specific criteria that spans over time can help states better understand whether improvement can generalize to other indicators in identified schools.

## ***Significance***

Especially in a system in which classifications are made on a normative basis (e.g. the lowest 5% of schools are classified) small differences that may or may not be meaningful can be the difference between schools that are classified as needing improvement and those that are not. Furthermore,

identified schools that demonstrate small but meaningful improvement may still fall below the identification threshold other non-identified schools also make improvements. While small differences may also influence classification in a criterion-referenced system, we draw a distinction because an assumed 'meaningfulness' built into the criteria. When it comes to determining exit criteria it is particularly important to determine if improvement is consequential or significant, and to sufficiently communicate expectations for improvement to schools to ensure they are well-informed of the progress they need to make in order to exit.

This principle requires evidence that the magnitude and scope of improvement is more likely to be authentic than a statistical anomaly. Some of the strategies discussed previously can provide supporting evidence such as specifying performance profiles that take into account criteria for multiple indicators or requiring sustained improvement over time. Additionally, specific examples of how to design exit criteria are provided in other resources provided by CCSSO<sup>5</sup>.

Another strategy to signal significance is to couple exit criteria with the state's goals. For example, an exit criterion might specify that the school has met the state's Measure of Interim Progress (MIP) toward the long-term goals for all students and all student groups. Another approach is to base expectations on research that provides more confidence that problematic patterns are unlikely to emerge. For instance, the state may analyze historical performance patterns and identify performance criteria where schools would have a very low probability of falling below the identification threshold in future years based on typical school conditions or performance alone.

## ***Internal Corroboration***

Internal corroboration refers to evidence that the school benefitted from practices to improve teaching and learning in areas logically related to the identified area(s) of need. Simply stated, if one assumes that certain practices lead to improved outcomes, do we know that those practices were implemented? If not, then improvement is less likely to be substantiated, capacity is less likely to have been increased, or assumptions within the theory of action<sup>6</sup> were not present or confirmed. Underlying this principle is the notion that schools that exit identification are unlikely to be re-identified because they should be able to sustain behaviors and practices that will result in sustained improvements.

This principle of internal corroboration is likely to be more qualitative than quantitative and will be supported by evidence that inputs or interventions deemed central to the state's model for

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5 For additional information on developing exit criteria, see:

D'Brot, Lyons, & Landl (2017). State Systems of Identification and Support under ESSA: Evaluating Identification Methods and Results in an Accountability System. CCSSO: Washington, D.C.; Pages 13-15.

School and District Improvement Frequently Asked Questions. Topic 1: Identification of Schools.

Carrol, K (2018). Improving Outcomes for Students: Bringing Accountability and School Improvement Together to Drive Change. CCSSO: Washington, D.C.: Pages 17-18.

6 For accountability systems, a theory of action refers to how the accountability system is intended to function in order to bring about the state's desired outcomes, which should be tested and revisited through system implementation, monitoring, and evaluation (D'Brot, Keng, & Landl, 2018).

school improvement were implemented with fidelity. For example, was a school improvement plan in place? Can the state verify that the plan met the state's standards for quality and completeness and that the school, in fact, received the number, type, and quality of interventions and supports specified in that plan? Is there evidence of increased school capacity to engage in needs assessments in support of the school improvement plan? To the extent the school can provide and the state can substantiate affirmative responses to these questions, internal corroboration is strengthened.

### **External Corroboration**

Although this may be the most ambitious principle to support, ideally, claims of authentic and sustainable improvement are bolstered by evidence that goes beyond what the accountability system and support system addresses.

A plan to externally corroborate findings includes data from multiple sources that support claims of improvement. This may include more proximal indicators like: rising performance on a range of academic assessments in multiple content areas, increased quality and quantity of course offerings, favorable results from external accreditation or reviews, or evidence that teachers and leaders are highly qualified and meet the standards for professional practices. More distal indicators such as reductions in drop-out rates or improvements in college-going rates also lend strong support to a claim of real and sustained school improvement.

In fact, a program of external corroboration may be more properly associated with an ongoing evaluation plan for the accountability system, rather than a factor that directly influences exit criteria. External corroboration represents an important source of evidence to help states monitor accountability system efficacy and improvement.

## **APPLICATION**

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In this section we start by listing several potential criteria for exit standards and show how they corresponded with the first four guiding principles. Then, we will provide some illustrative examples to show how exit standards could be designed and applied for schools with selected characteristics.

### **Potential Criteria**

While far from exhaustive, a list of potential criteria for exit standards for CSI, ATSI, or another performance category are summarized in Table 3.

**Table 3. Potential Criteria for Exit Standards**

	Coherence	Consistency	Significance	Internal Corroboration
Establish an overall performance threshold (with similar or different profiles/weights)	●			
Establish minimum performance standards for specific indicators	●			
Establish minimum performance standards for specific student groups	●			
Require multiple years of performance at or above standard		●	●	
Set performance standard on multi-year composite		●	●	
Apply confidence interval to standard		●	●	
Set a minimum threshold for the magnitude of progress on one or more indicators	●		●	
Link standard to long-term or interim policy goal	●	●	●	
Require validated improvement plan that addresses priority areas	●			●
Collect evidence to substantiate the implementation of one or more support initiatives	●			●

### Illustrative Examples

One strategy for developing or evaluating possible exit standards is to consider how the collection of criteria satisfy each of the four principles. That is, states would select a combination of exit criteria that work together to address each principle. Illustrative examples are shown in Table 4. We have also included references to criteria that may benefit from additional information or clear definitions which would provide schools with transparent guidance on the progress needed to meet the state-wide exit criteria.

**Table 4. Illustrative Profiles for Exit Standards**

Context	Illustrative Criteria
School designated CSI; system identifies Title I schools which rank in the lowest 5% on overall index score	<p>School must achieve qualifying exit score associated with meaningful progress (as defined by X) toward long term goals on the overall performance index for two (or some other state-defined number) consecutive years AND the school must meet a minimum threshold score (as defined by X) for each indicator and each student group in the candidate year of exit. Qualifying improvement plan is in place and implementation of supports in all priority areas is substantiated (as defined by X).</p> <p>Schools failing to exit CSI after four years receive more rigorous state intervention (which would include example interventions for local communication).</p>
High school designated CSI for low graduation rate	<p>Graduation rate meets the exit standard associated with meaningful progress (as defined by X) toward long term goals for all students and all student groups for two (or some other state-defined number) consecutive years. The school is not otherwise identified for CSI, TSI, or ATSI. Qualifying improvement plan is in place and implementation of supports in all priority areas is substantiated (as defined by X).</p> <p>Schools failing to exit CSI after four years receive more rigorous state intervention (which would include example interventions for local communication).</p>
School designated ATSI based on performance of a student group	<p>The student group meets the exit standard for two consecutive years AND demonstrates progress at a rate sufficient to close the gap to the long-term goal by 50% in six years or less (or some other state-defined timeline). The school is not otherwise identified for CSI, TSI, or ATSI. Qualifying improvement plan is in place and implementation of supports in all priority areas is substantiated.</p> <p>Schools failing to exit ATSI after three years are designated CSI.</p>

## CONCLUSION<sup>7</sup>

As previously noted, there is no one correct method for establishing appropriate exit standards. Moreover, the specific context, policy priorities, and capacity of each state will certainly influence how exit standards are developed and implemented. Even so, we believe the principles discussed in this brief can serve as a useful guide to help state leaders develop and implement appropriate criteria to inform the conditions schools must meet to exit support classifications.

7 Less focus was given in this brief to external corroboration, which is not meant to diminish its importance with respect to developing and validating exit criteria. On the contrary, efforts to ensure the criteria are meaningfully related to a range of prized short- and long-term outcomes are essential. We recommend that state leaders consider such activities as part of an overall plan to evaluate, monitor, and refine the system over time to ensure it appropriately supports the state's policy priorities. Two recent and relevant resources that states leaders can review include the following:

For confirming design decisions and building validity arguments for accountability systems: D'Brot, Keng, & Landl (2018) Accountability Identification is only the Beginning: Monitoring and Evaluating Accountability Results and Implementation. CCSSO: Washington, D.C.

For exit criteria and impact of system design: D'Brot, Lyons, & Landl (2017). State Systems of Identification and Support under ESSA: Evaluating Identification Methods and Results in an Accountability System. CCSSO: Washington, D.C.



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